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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Nicoleta Maria Tulai,

Plaintiff,

v.

Merrick Garland, Attorney General of the
United States of America; Alejandro
Mayorkas, Secretary of Department of
Homeland Security; Ur Jaddou, U.S.
Citizenship and Immigration Services;
Richard T. Murray, Field Office Director,
Reno Field Office U.S. Citizenship and
Immigration Services,

Defendants.

Case No. 3:23-cv-00351-LRH-CLB

**Order Granting Stipulation to Extend
the United States' Deadline to Answer
or otherwise respond to Plaintiff's
Petition for De Novo Review of Denial
of N-400 Application for Naturalization
[ECF No. 1]**

(Third Request)

Plaintiff, Nicoleta Maria Tulai, through counsel, and the United States of America, on behalf of Federal Defendants, through counsel, hereby agree and stipulate to extend the deadline to answer or otherwise respond to Plaintiff's Petition for De Novo Review of Denial of N-400 Application for Naturalization by an additional 30 days, until **April 3, 2024**. The parties enter into this stipulation based on the following:

1. Plaintiff filed her Petition on July 14, 2023 (ECF No. 1).
2. Plaintiff served the United States with a copy of the Summons and Petition on November 6, 2023.

1 3. The original deadline for Federal Defendants to answer or otherwise respond
2 was January 2, 2024. The parties stipulated (ECF No. 7) and the Court granted (ECF No.
3 8) a 30-day extension to allow the parties to continue to work through this case in hopes of
4 resolving without the Court's intervention.

5 4. After an additional stipulation and Court order, the current deadline to
6 respond is March 4, 2024. *See* ECF No. 10.

7 4. Since the filing and serving of the Petition, and the granting of the first two
8 extensions, the parties have continued to engage in additional and productive discussions
9 that may resolve the issues in this case without the Court's intervention. The requested
10 additional 30-day extension will allow the parties, particularly Plaintiff's counsel additional
11 time to work with his client to decide on a plan of action moving forward. Should the
12 parties be able to resolve the matter without further litigation, a dismissal will follow.
13 Should the parties be unable to resolve the matter without Court intervention, Federal
14 Defendants will move forward with responding to Plaintiffs' Petition on or before **April 3,**
15 **2024.** Accordingly, the parties believe good cause exists for the extension in the interest of
16 judicial economy and the parties' resources.

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1 Therefore, the United States requests that the Court extend the deadline for the
2 United States to answer or otherwise respond to **April 3, 2024**.

3 Respectfully submitted this 1st day of March 2024.

4 JASON M. FRIERSON
5 United States Attorney

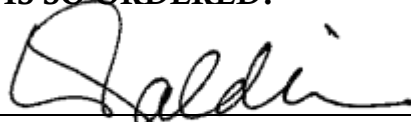
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11 *Attorney for Plaintiff*

12 /s/ Skyler H. Pearson
13 SKYLER H. PEARSON
14 Assistant United States Attorney

15 *Attorneys for the United States*

16 **IT IS SO ORDERED:**

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19 UNITED STATES MAGISTRATE JUDGE

20 **DATED:** March 1, 2024
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